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*Attorneys for Defendants Upright Citizens Brigade, LLC
Alex Sidtis, and Shannon Patricia O'Neill*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AARON GLASER,

Plaintiff,

-against-

UPRIGHT CITIZENS BRIGADE, LLC, ALEX
SIDTIS, and SHANNON PATRICIA O'NEILL,

Defendants.

Case No.: 18-cv-971 (JPO)

ECF Case

AFFIDAVIT OF ALEX SIDTIS

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ALEX SIDTIS, being duly sworn, deposes and says:

1. I am currently employed by Upright Citizens Brigade, LLC ("UCB"), a New York limited liability company, as its Managing Director. I have been employed as Managing Director of UCB since approximately May 2003. UCB operates two improvisational and sketch comedy theatres, located in New York, New York.

2. One theatre is located at 555 W. 42nd St., New York, NY, 10036, in the Hell's Kitchen neighborhood of New York (the "Hell's Kitchen Theatre"), and the other theatre is located at 153 East 3rd St. in New York's East Village neighborhood. The Hell's Kitchen Theatre

had previously been located in Chelsea at 307 W. 26th St., New York, NY 10001 (the “Chelsea Theatre”), during the relevant times listed in the Complaint.

3. Plaintiff Aaron Glaser was a volunteer performer at the Chelsea Theatre.

4. Upright Citizens Brigade Training Center, LLC (the “Training Center”) is a separate and distinct New York limited liability company from UCB. The Training Center, not UCB, offers improvisational and sketch comedy classes (UCB and the Training Center hereinafter to be referred to together as the “New York Entities”). UCB is not an educational institution.

5. The New York Entities have never received federal funds nor financial assistance nor executed any assurance agreeing to comply with Title IX, 20 U.S.C. §1681 (a)(1972) *et seq.* (hereinafter “Title IX”) regulations.

6. In addition to the New York Entities, there are three discrete additional entities located in California with a similar mission to UCB: Upright Citizens Brigade Training Center LA, LLC (an improvisational and sketch comedy training center), UCB Inner Sanctum, LLC (a café and performance space), and UCBTLA, LLC (an improvisational and sketch comedy theatre) (collectively, the “California Entities”).


7. The California Entities have never received federal funds nor financial assistance nor executed any assurance agreeing to comply with Title IX regulations.

8. In addition to the California Entities, there is another entity in California, 5419 Sunset Properties, LLC (“5419 Sunset”). 5419 Sunset is a real estate holding company that owns the land located at 5419 W. Sunset Boulevard in Los Angeles. 5419 Sunset also owns a theatre and office space at that location and leases the space to the California Entities.

9. 5419 Sunset has no involvement whatsoever in teaching, education, or even performances. Its relationship to the California Entities is that it leases space to them.

10. In 2012, 5419 Sunset took out a federal small business loan ("SBA") for the purpose of constructing and rebuilding the theatre and office space located on its property at 5419 W. Sunset Boulevard in Los Angeles. 5419 Sunset received funding from its SBA loan on May 13, 2015.

11. Neither the New York Entities nor the California Entities received any direct or indirect funding from the SBA.



Alex Sidtis

Sworn to before me this 23rd
day of May, 2018.



NOTARY PUBLIC

